



Just-Property Ltd – GDPR Client Data Register

Company Name	Just-Property Ltd		
Contact	Justin Coughlan	Role	Managing Director
Email	jcoughlan@just-property.ie	Contact number	01 631 52 51

1. Just-Property Ltd Point of Contact with responsibility for Data Protection

Name	Justin Coughlan	Job title	Managing Director
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2. Has this person been appointed as an official Data Protection Officer or as a Privacy Officer for example

Data Protection Officer

3. Does Just-Property Ltd have a Privacy/Data Protection in Place

Yes

4. If Yes – Is Privacy Policy available on your Website and has it been communicated to Clients & Suppliers?

On website	Yes	Communicated	In Process
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5. If Yes – Is this Privacy Policy available on your Website?

Yes

6. Does Your Privacy Policy clarify the following:

Why you Collect Data	Yes	No	Note
How you collect Data	Yes	No	Note
How you store Data	Yes	No	Note
With whom do you share data	Yes	No	Note
How you use that data	Yes	No	Note
Consent in Data Collection	Yes	No	Note
How to Delete/Dispose of the Data	Yes	No	Note
Providing Data Access on Request	Yes	No	Note

7. What Personal Data might Just-Property receive and store

<ul style="list-style-type: none"> • First name, Last name • Contact information including email address and telephone number • Company or Home Address and Billing Address • PPS number • Sign up time and date • References, wage slip, bank statements (Tenants only)

- **Proof of address and copy of photo identification – to comply with Anti Money Laundering Legislation**
- **Newsletter subscription (only if you have opted-in)**
- **Banking Details (but we do not store sensitive payment data)**
- **Cookies (please refer to Cookie Policy section)**
- **Google Analytics (no personal identifiable is passed on – all information is anonymized)**

8. How do we collect this data

When you visit our website

- Cookies are present to store statistical details (See cookies section)
- Google Analytics identity general data on what pages users access and long they stay
- You might submit enquiries

When you use the Sales, Letting and Valuations Services that we provide

- Details noted when you make enquiry by face to face, phone calls, email or via website
- Forms (Tenant Registration, Valuation Terms of Engagement)
- Details required relating to contractual obligations
- Photography may be taken for the purpose of brochures, valuations and advertising.

When you provide us with Consent to send you regular updates

- Email Consent
- Newsletter Sign Up Form on Website
- Hardcopy Written Consent

When you visit or engage with our Social Media Platforms

- Engagement (Likes/Comments/Competitions on Facebook/Twitter/LinkedIn)

9. Why we hold your data

General:

- The provision of Customer Service, Enquiry Responses, Quotations and other follow up information on your request To manage vendor accounts and for accounting (payment) purposes
- To comply with Regulations and Statutory Obligations
- To provide personnel, payroll and pension administration services in connection with our employees
- To get and retain Clear and Opt-In Consent for further marketing follow up
- For provision of the enforcement of legal rights for the protection of both our interests
- For provision of Billing, Payment, Remittance or receipt/payment of money on your behalf

Estate Agent Service:

- In the provision of sales service by private treaty, by auction or by tender. Processing is necessary to enable us to keep in contact with the vendor and those that have made an enquiry for the subject property.
- To comply with the Property Services (Regulation) Act 2011.

Valuation Service:

- To comply with the Property Services (Regulation) Act 2011.



- To arrange access to the subject property.
- To speak with the applicant to seek information with regard to the subject property.

Letting Agent Service:

- To prepare letting agreements
- To comply with Residential Tenancies Act 2006
- To comply with the Property Services (Regulation) Act 2011.
- To set up utility bills such as electricity and gas.
- To provide access for service engineers and white goods/furniture delivery
- To pass to landlord when the service being provided by the agent is a let only service.

Managing Agent Service:

- Processing is necessary for the performance of a contract to which the data subject is party
- Processing is necessary for compliance with a legal obligation to which the Data Collector is subject. In this instance the Management Company is required by the Companies Act 2014 to maintain adequate accounting records. Similarly, under the Multi-Unit Development Act 2011 (MUD Act) a unit owner is under an obligation to furnish the management company with the information. Failure to do so would constitute a breach of the MUD Act which could result in civil action.

10. How long we hold your data

We have policy based and regulatory obligations that mean we must keep your data while you are a client and for certain periods of time after you stop being a client. Those periods depend on the nature of the work we have done for you.

- General Data Retention Policy - we retain all general data for a period of 7 years

11. How Hutchinson Auctioneers currently store personal data and ensure the security of this

Hardcopy Data (Paper)	Documents are stored in a locked Office in Individual covered Files Data is managed Safely and not left in areas where non relevant employees can access Any data which might be viewed as in any way sensitive is stored in locked cabinets in a secure office
Softcopy Data (Electronic)	Antivirus Software is used on all IT Systems Encryption is enabled on all IT systems holding Personal Data A Firewall assists against Network Intrusion Wi-Fi is secure

12. Just-Property Ltd processes for ensuring that the 3rd Parties and Contractors with who you work are GDPR Compliant

We expect and actively require any Third Parties with whom we work to be compliant with their legal obligations under Data Protection.

It is our policy to require all contractors or those who may come into contact with any Personal Data we hold to show GDPR compliance via self-assessment and audit through our Supplier Data Protection Checklist. We will store this checklist for the duration of our working relationship with that 3rd party (+ 12 months)

13. Just-Property Ltd process for providing Data Subjects with their data Access Rights under GDPR within the 30 day limit and free of charge

Just-Property Ltd stores Personal Data on Paper Based Systems or as Electronic Data – on a Cloud Based Secure Database System. All information can be identified easily through internal systems and prepared for data access requests – typically within 48 hours.

We endeavor, where the request is not considered excessive, to supply the person data to the data subject within 10 working days, but reserve the right to take the 30 day limit. There will be no charge for this Data Access provision.

14. What processes and methods do we use to properly anonymize and encrypt personal data?

Encryption is enabled on all IT systems holding Personal Data

15. The data privacy and protection awareness training Hutchinson Auctioneers employees receive

Training sessions will have been completed with all staff for GDPR. All future induction sessions will include a specific session on data protection.

16. Just-Property Ltd process for detecting breaches and your procedure for logging, communicating & Reporting breaches

The DPO will conduct regular inspections and maintain a systematic audit schedule to monitor compliance and Optima Training will actively record and report any Breaches in relation to Data Protection. Any employee, client or 3rd party can alert the DPO to the breach, who will update the Breach Log before identifying the breach type and evaluate any risk associated with the breach.

Where there is a possibility of risk, and where the personal data breached is neither Encrypted nor Anonymized, the DPO will report the breach to the DPC, and depending on the severity/urgency of the risk – may also notify the data subject. This will be done as soon as possible – and within the required 72 hour limit.

17. Hutchinson Auctioneers process for data disposal - including Identifying, Tracking, Deleting and/or professionally destroying data (if required)

Once the period of stated storage is complete, or based on a Request to delete personal data (presuming we have no legal or statutory obligation to retain it) – it is our policy to have your personal data securely disposed of – through bi-annual scheduled contracts with our professional shredding company.

This service will dispose of personal data such as has been collected on tenant application forms, references, photo identification and proof of address and more.

Data will be securely deleted from the following media:



- Paper Based Files
- CRM & Database Systems
- Electronic Storage – including Hard Disks and Email
- Backup Date will be deleted also in relation to these files

18. Just-Property process by which consent is obtained for the use of personal data:

Sometimes we need your consent to use your personal information. With direct marketing for example, we need your consent to make you aware of services which may be of interest to you. We may do this by phone, post, email, text or through other digital media. It is our policy to keep, in as far as is possible, a documented record of this consent.

Often, at the end of a course or piece of work for you, we contact you to give and get feedback. We will generally provide options at this point in relation to how you might provide consent or otherwise for us to contact you with updates, marketing material and other promotions.

This can be via:

- Email Consent
- Newsletter Sign Up Form on Website
- Hardcopy Written Consent

19. For further information:

Contact us on 01 631 52 52, emailing us on DPO@just-property.ie or contact us in our office Just-Property Ltd., 24 Thorncastle Street, Ringsend, Dublin 4.

I confirm to the best of my knowledge that all details above are accurate and our organization operates to the processes and procedures outlines and that in doing so – we are compliant with GDPR and the related data protection regulations.

Name	Justin Coughlan
Signature	
Role	Data Protection Officer